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November 25, 2024

Via ECF

Robert M. Levy
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza
Brooklyn, New York 11201

Re: Donna Lashley v New York University, Case No. 1:22-cv-01054

Dear Judge Levy:

We represent Defendant New York University and submit this letter in response to Plaintiff's November 23, 2024 letter seeking leave to take a fourth deposition. Defendant respectfully requests that Plaintiff's application be denied. Defense counsel repeatedly requested information from Plaintiff about the length and timing of depositions to facilitate scheduling before the November 20, 2024 close of discovery, but Plaintiff did not provide the requested information, including number of hours needed for each witness. Nevertheless, we were able to schedule two depositions in November, but Plaintiff canceled both depositions a day before they were scheduled to occur. Defendant respectfully submits that Plaintiff has had sufficient time to take the depositions needed and that she should be limited to the three depositions that the Court already approved, particularly since she has provided no justification for the need to depose the fourth individual other than her view that it will be helpful for mediation.

Thank you for your consideration.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Susan D. Friedfel".

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SDF/jk
cc: Robert Vance, Esq. (via ECF)